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Attorneys for Defendants  
ALLIED PROPERTY AND CASUALTY  
INSURANCE COMPANY, AMCO INSURANCE  
COMPANY, and NATIONWIDE MUTUAL  
INSURANCE COMPANY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
SAN DIEGO DIVISION

1800 SOUTH MAPLE STREET, LLC, a  
California Limited Liability Company;  
RALPH J. GIANNELLA, an individual;  
GIANNELLA PROPERTIES, INC., a  
California Corporation; WILLIAM G.  
AYYAD, an individual; WILLIAM G.  
AYYAD, INC., a California Corporation;  
an PREMIER COMMUNITIES, LLC, a  
California Limited Liability Company,

Plaintiff,

vs.

ALLIED PROPERTY AND  
CASUALTY INSURANCE COMPANY,  
an Iowa Corporation; AMCO  
INSURANCE COMPANY, an Iowa  
Corporation; NATIONWIDE MUTUAL  
INSURANCE COMPANY, an Ohio  
Corporation, and DOES 1 to 100,  
inclusive,

Defendants.

CASE No. 07-CV-2030

**DECLARATION OF KAREN L. UNO IN  
SUPPORT OF DEFENDANTS'  
OPPOSITION TO PLAINTIFFS' MOTION  
FOR LEAVE TO AMEND; EXHIBITS**

Date: February 29, 2008  
Time: 1:30 P.M.  
Courtroom: Honorable Judge Jeffrey T. Miller

Date Filed: September 10, 2007  
Date Removed: October 19, 2007  
Trial:

1 I, Karen L. Uno, declare as follows:

2 1. I am an attorney, licensed to practice law before all courts in the State of  
3 California. I am a partner in the law firm of Long & Levit LLP, counsel of record in this matter  
4 for Defendants ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY, AMCO  
5 INSURANCE COMPANY, and NATIONWIDE MUTUAL INSURANCE COMPANY. I was  
6 also co-counsel for AMCO in the matter entitled Avocado Crest v. Allied Mutual Insurance  
7 Company, et.al., San Diego County Superior Court Case No. GIC 857918. I have personal  
8 knowledge of the following facts, and would competently testify to their truthfulness if called as  
9 a witness in this matter.

10 2. I have reviewed AMCO's claim file pertaining to this matter and portions  
11 of AMCO's coverage counsel's file regarding the claim at issue and would competently testify  
12 to the following if called as a witness in this matter.

13 3. Attached as Exhibit "A" to this declaration is a true and correct copy of  
14 the Second Amended Complaint from the case entitled, Avocado Crest Condominiums, LLC, et  
15 al. v. Allied Mutual Insurance et. al., (GIC 857918), filed in the San Diego County Superior  
16 Court.

17 4. Attached as Exhibit "B" to this declaration is a true and correct copy of  
18 the letter from Andrea Ray to Bob Johnson of AMCO dated January 12, 2006, without  
19 enclosures.

20 5. Attached as Exhibit "C" to this declaration is a true and correct copy of  
21 the letter from Robyn Spagnulo to Scott A. Johnson of Miller Johnson Law dated March 9,  
22 2006.

23 6. Attached as Exhibit "D" to this declaration is a true and correct copy of  
24 the letter from C. Brant Noziska to Scott Johnson dated May 7, 2007.

25 7. Attached as Exhibit "E" to this declaration is a true and correct copy of  
26 the letter from Scott A. Johnson to Neal H. Rockwood dated May 21, 2007.

27 8. Attached as Exhibit "F" to this declaration is a true and correct copy of  
28 the case entitled, Farrugia v. Allstate Insurance Company, 2007 U.S. Dist. LEXIS 22628 (N.D.

1 Cal. 2007).

2 9. Attached as Exhibit "G" to this declaration is a true and correct copy of  
3 the case entitled, Gunn v. Wild, 2002 U.S. Dist. LEXIS 3628 (N.D. Cal. 2002).

4 10. Attached as Exhibit "H" to this declaration is a true and correct copy of  
5 the case entitled, Miskuski v. Crescent Heights of America, Inc., 2007 U.S. Dist. LEXIS 37223  
6 (S.D. Cal. 2007).

7 I declare under penalty of perjury, under the laws of the State of California, that the  
8 foregoing is true and correct and that this declaration was executed this 15th day of February,  
9 2008 at San Francisco, California.

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12 Karen L. Uno

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